

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re	§	Chapter 11
SANCHEZ ENERGY CORPORATION, <i>et al.</i>	§	Case Nos. 19-34508 (MI)
SN PALMETTO, LLC,	§	19-34509
SN MARQUIS LLC,	§	19-34510
SN COTULLA ASSETS, LLC,	§	19-34511
SN OPERATING, LLC,	§	19-34512
SN TMS, LLC,	§:	19-34513
SN CATARINA, LLC	§:	19-34514
ROCKIN L RANCH COMPANY, LLC	§	19-34515
SN EF MAVERICK, LLC	§	19-34516
SN PAYABLES, LLC,	§	19-34517
SN UR HOLDINGS, LLC,	§	19-34518
Debtor(s).		Jointly Administered

NOTICE OF APPEAL

PLEASE TAKE NOTICE that the ad hoc group of certain unaffiliated funds, accounts, and/or managers of funds or accounts, as beneficial holders of Secured Notes, and as lenders under the debtor-in-possession credit agreement (“Secured Notes Ad Hoc Group/DIP Lenders”)¹ hereby appeal to the United States District Court for the Southern District of Texas from the order D.I. 1848 (“Order”) entered on March 10, 2021. A copy of the Order is attached hereto as **Exhibit A**. A copy of the Court’s opinion in support of the Order D.I. 1847 (“Opinion”) is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that the names of all parties to the Order appealed from and the names, addresses, and telephone numbers of their respective attorneys are as follows:

¹ The Secured Notes Ad Hoc Group/DIP Lenders consists of Apollo Commodities Management, L.P.; Capital Research and Management Co.; CQS (UK) LLP; Cross Ocean Partners Management LP; Fidelity Management & Research Company, LLC, on behalf of certain funds and accounts; The Northwestern Mutual Life Insurance Co.; Orbis Investment Management Limited (as agent for and on behalf of certain funds); and Southpaw Credit Opportunity Master Fund, L.P.

Appellants:

Secured Notes Ad Hoc Group/DIP Lenders

Counsel for Appellant Secured Notes Ad Hoc Group/DIP Lenders

<p>FOLEY & LARDNER LLP John P. Melko (TX 13919600) Jay Munisteri (TX 14667380) Sharon M. Beausoleil (TX 24025245) 1000 Louisiana Street, Suite 2000 Houston, Texas 77002 Telephone: (713) 276-5727 Facsimile: (713) 276-6727 Email: jmelko@foley.com jmunisteri@foley.com sbeausoleil@foley.com</p>	<p>MORRISON & FOERSTER LLP Dennis L. Jenkins (admitted <i>pro hac vice</i>) Brett H. Miller (admitted <i>pro hac vice</i>) James E. Hough (admitted <i>pro hac vice</i>) Haimavathi V. Marlier (admitted <i>pro hac vice</i>) 250 West 55th Street New York, New York 10019 Telephone: (212) 468-8000 Facsimile: (212) 468-7900 Email: djenkins@mofo.com brettmiller@mofo.com jough@mofo.com hmarlier@mofo.com</p>
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Wilmington Savings Fund Society, FSB, in its capacity as successor indenture trustee under the Indenture dated February 14, 2018 (filing a separate notice of appeal)

Counsel for Appellant Wilmington Savings Fund Society, FSB, in its capacity as successor indenture trustee under the Indenture dated February 14, 2018

<p>COLE SCHOTZ P.C. Michael D. Warner (TX 00792304) Benjamin Wallen (TX 24102623) 301 Commerce Street, Suite 1700 Fort Worth, TX 76102 Telephone: (817) 810-5265 Facsimile: (817) 977-1611 Email: mwarner@coleschotz.com bwallen@coleschotz.com</p> <p>Daniel Geoghan (admitted <i>pro hac vice</i>) 1325 Avenue of the Americas, 19th Floor Telephone: (212) 752-8000 Facsimile: (646) 563-7925 Email: dgeoghan@coleschotz.com</p>	<p>ARNOLD & PORTER KAYE SCHOLER LLP Jonathan I. Levine (admitted <i>pro hac vice</i>) Jeffrey A. Fuisz (admitted <i>pro hac vice</i>) 250 West 55th Street New York, NY 10019 Telephone: (212) 836-8000 Facsimile: (212) 836-8689 Email: jonathan.levine@arnoldporter.com jeffrey.fuisz@arnoldporter.com</p> <p>Ginger Clements (admitted <i>pro hac vice</i>) 70 West Madison Street, Suite 4200 Telephone: (312) 583-2300 Facsimile: (312) 583-2360 Email: ginger.clements@arnoldporter.com</p>
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Appellees:

Delaware Trust Company in its capacity as Lien-Related Litigation Creditor Representative

Counsel for Appellee

<p>QUINN EMANUEL URQUHART & SULLIVAN, LLP Patricia B. Tomasco (TX 01797600) Christopher Porter Devin van der Hahn 711 Louisiana Street, Suite 500 Houston, Texas 77002 Telephone: (713) 221-7000 Facsimile: (713) 221-7100 Email: pattytomasco@quinnemanuel.com chrisporter@quinnemanuel.com devinvanderhahn@quinnemanuel.com</p> <p>Benjamin I. Finestone (admitted <i>pro hac vice</i>) Kate Scherling (admitted <i>pro hac vice</i>) 51 Madison Avenue, 22nd Floor New York, New York 10010 Telephone: (212) 849-7000 Facsimile: (212) 849-7100 Email: benjaminfinestone@quinnemanuel.com katescherling@quinnemanuel.com</p> <p>K. John Shaffer (admitted <i>pro hac vice</i>) Matthew Scheck (admitted <i>pro hac vice</i>) 65 South Figueroa Street, 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000 Facsimile: (212) 443-3100 Email: johnshaffer@quinnemanuel.com matthewscheck@quinnemanuel.com</p>	<p>LOCKE LORD LLP Stephanie Wickouski (admitted <i>pro hac vice</i>) 200 Vesey Street New York, New York 10281 Telephone: (212) 415-8600 Facsimile: (212) 303-2754 Email: swickouski@lockelord.com</p>
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Dated: March 24, 2021

Houston, Texas

Respectfully submitted,

MORRISON & FOERSTER LLP

Dennis L. Jenkins

(admitted *pro hac vice*)

Brett H. Miller (admitted *pro hac vice*)

James E. Hough (admitted *pro hac vice*)

Haimavathi V. Marlier (admitted *pro hac vice*)

250 West 55th Street

New York, New York 10019

Telephone: (212) 468-8000

Facsimile: (212) 468-7900

E-mail: djenkins@mofo.com

brettmiller@mofo.com

jhough@mofo.com

hmarlier@mofo.com

FOLEY & LARDNER LLP

/s/ John P. Melko

John P. Melko

Texas State Bar No. 13919600

jmelko@foley.com

Jay Munisteri

Texas State Bar No. 14667380

jmunisteri@foley.com

Sharon M. Beausoleil

Texas State Bar No. 24025245

sbeausoleil@foley.com

1000 Louisiana, Suite 2000

Houston, Texas 77002

Telephone: (713) 276-5500

Facsimile: (713) 276-5555

Counsel to the Secured Notes Ad Hoc Group/DIP Lenders